



Handley Farah & Anderson PLLC

October 1, 2020

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

Re: Belle, et al., v. City of New York, et al., 19 CV 2673 (VEC)

Dear Judge Caproni:

The parties respectfully submit this joint update in accordance with the Court's June 21, 2019 Order (ECF No. 18).

Over the past month, the parties have taken the following actions to further the litigation:

- On September 1, 2020, the parties submitted a proposed amended litigation schedule, which the Court so-ordered (ECF No. 64).
- By March 19, 2020, Defendant City confirmed that record searches had been documented for Plaintiffs Richmond Appiah, Bonacio Crespi, and Edison Quito. On September 25, 2020, the City identified the NYPD officers involved in the alleged stop and records search of plaintiff Richmond Appiah. On September 30, 2020, the City produced records relating to Edison Quito, which in the City's opinion demonstrates that the previously identified record search conducted for Quito was made in connection with a separate incident resulting in a summons issued to Quito. The City has represented that it has no other indication that a records search was conducted for Quito on any other relevant dates. Plaintiffs still await identification of the NYPD officers involved in the stop and record search of Plaintiff Crespi and

requested document production related to his stop. The parties will meet and confer about the scope of additional disclosures and the timeline for outstanding document productions.

- The parties have scheduled the deposition of NYPD Sergeant Joseph Klubnick for October 29, and have been meeting and conferring about deposition schedules for the named plaintiffs and NYPD officers involved in the alleged stops and records searches.

Thank you for your consideration of this matter.

Respectfully submitted,

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